

**Chukwuyere Ebere Izuogu LL.B (UNIBEN), LL.M (Hannover)
ACI Arb, AMBCS, CIPP/E**

31 May 2022

dwizard65@gmail.com

Dear Emem William,

NOTICE OF DEFAMATION AND DEMAND FOR RETRACTION

I act for Mr. Caleb Olumuyiwa Ogundele hereinafter referred to as my client and on whose instructions I am writing to you.

Yesterday 30 May 2022, my client informed me that you sent an email in which the group email address rpd@afriNIC.net was in copy whereby you made certain defamatory statements about my client. In particular, you stated that:

“...not like you who at a time claimed to work for a University who (sic) never employed you”

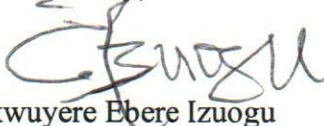
and further that:

“Thank you for your response and mentioning the University of Ibadan. I have done that already as I only make factual claims. I have the response that is very clear on the 3rd party circumstances and never as you claimed”.

These statements were made by you in the context of alleging that my client falsely claimed to have been employed by the University of Ibadan. On the backdrop of this, I have come to the irresistible conclusion that your statements are based on malice and deliberately made to disparage my client and to bring him to public opprobrium, loss of goodwill and to expose him to ridicule. It is also apparent that the natural and ordinary meaning of the words used in your statements as reproduced above portray our client as a fraud and patent liar. These statements which are indeed false, have exposed my client to contempt, tend to injure his reputation as the current President of Internet Society Nigeria and would lower him in the estimation of right-thinking members of rpd@afriNIC.net and within the internet governance community generally.

By this letter, you are hereby demanded to RETRACT these false claims of yours containing the defamatory statement by sending an email to my client with rpd@afriNIC.net in copy. You are also to DESIST further defamatory statements made against my client. If there is any failure on your part to comply with this demand, I have my client's instruction to take appropriate action against you and to seek all the available damages and remedies in a court of competent jurisdiction.

Yours faithfully,



Chukwuyere Ebere Izuogu

